

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i> v. GREGORY W. ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0844-XR
OCA-GREATER HOUSTON, et al., <i>Plaintiffs,</i> v. JOSE A. ESPARZA, et al., <i>Defendants.</i>	1:21-cv-0780-XR
HOUSTON JUSTICE, et al., <i>Plaintiffs,</i> v. GREGORY WAYNE ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0848-XR
LULAC TEXAS, et al., <i>Plaintiffs,</i> v. JOSE EXPARZA, et al., <i>Defendants.</i>	1:21-cv-0786-XR
MI FAMILIA VOTA, et al., <i>Plaintiffs,</i> v. GREG ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0920-XR

**PLAINTIFFS HOUSTON JUSTICE, HOUSTON AREA URBAN LEAGUE, DELTA
SIGMA THETA SORORITY, INC., THE ARC OF TEXAS, AND JEFFREY LAMAR
CLEMMONS' INITIAL DISCLOSURES**

COME NOW, Plaintiffs Houston Justice, Houston Area Urban League, Delta Sigma Theta Sorority, Inc., The Arc of Texas, and Jeffrey Lamar Clemmons (collectively, “Plaintiffs”), and serve their Initial Disclosures pursuant to Federal Rule of Civil Procedure (“Rule”) 26(a)(1):

Plaintiffs make these Initial Disclosures based upon the information reasonably available to them at the present time, recognizing that Plaintiffs’ investigation of this matter is ongoing. Accordingly, Plaintiffs do not represent that these Initial Disclosures identify every individual, document, or tangible thing potentially relevant to this lawsuit. Plaintiffs reserve their right to clarify, alter, amend, modify, or supplement these Initial Disclosures if and when additional information becomes available to them, to the extent required by the Rules, the Court’s local rules, and any applicable orders of the Court. These Initial Disclosures are not an admission as to the existence, relevance, or admissibility of the identified materials, or a waiver of any attorney-client or work product privilege, or other applicable privilege or immunity. In addition to the documents, electronically stored information, or other tangible things described herein, Plaintiffs also may rely upon other publicly available documents, electronically stored information, or other tangible things, and/or electronically stored information, or other tangible things produced by third parties in this or other litigation.

- 1. The name and, if known, address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs’ best information at the time of filing)
Gregory Wayne Abbott, Governor of Texas	Office of the Attorney General P.O. Box 12548 (MC-009) Austin, TX 78711-2548	<ul style="list-style-type: none"> • Information about the passage, enforcement, and effect of S.B. 1.

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Jose Esparza, Deputy Secretary of State of Texas	Office of the Attorney General P.O. Box 12548 (MC-009) Austin, TX 78711-2548	<ul style="list-style-type: none"> Information about the passage, enforcement, and effect of S.B. 1.
Warren Kenneth Paxton, Jr., Attorney General of Texas	Office of the Attorney General P.O. Box 12548 (MC-009) Austin, TX 78711-2548	<ul style="list-style-type: none"> Information about the passage, enforcement, and effect of S.B. 1.
Jacque Callanen, Elections Administrator of Bexar County	Office of the Attorney General P.O. Box 12548 (MC-009) Austin, TX 78711-2548	<ul style="list-style-type: none"> Information about the passage, enforcement, and effect of S.B. 1. Information about voting methods and voting history, and election administration in Bexar County.
Isabel Longoria, Elections Administrator of Harris County	Harris County Attorney's Office, 1019 Congress St. ,15 th Floor, Houston, TX 77002	<ul style="list-style-type: none"> Information about the passage, enforcement, and effect of S.B. 1. Information about voting methods, voting history, and election administration in Harris County.
Tina Kingshill, Coordinating Director, Houston Justice	c/o Kenneth Broughton Reed Smith LLP 811 Main Street, Suite 1700 Houston, TX 77002 Tel: (713) 469-3800	<ul style="list-style-type: none"> Information regarding Houston Justice's provisions of applications to vote by mail to inmates at the Harris County Jail Information regarding the effect of S.B. 1 on Houston Justice's operations
Durrel Douglas, Founder, Executive Director, Houston Justice	c/o Kenneth Broughton Reed Smith LLP 811 Main Street, Suite 1700 Houston, TX 77002 Tel: (713) 469-3800	<ul style="list-style-type: none"> Information regarding Houston Justice's mission Information regarding the effect of S.B. 1 on Houston Justice's operations

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
<p>Judson Robinson III, President & CEO, Houston Area Urban League</p> <p>Ray Shackelford, Center for Social Justice & Education, Houston Area Urban League</p>	<p>c/o Kenneth Broughton Reed Smith LLP 811 Main Street, Suite 1700 Houston, TX 77002 Tel: (713) 469-3800</p>	<ul style="list-style-type: none"> • Information regarding HAUL's history, mission, and political participation activities. • Information regarding HAUL's political participation activities in Texas. • Information regarding the effects of S.B. 1 on HAUL's political participation resources and activities. • Information regarding the effects of S.B. 1 on voters' ability to cast a ballot that will count in Texas. • Information regarding HAUL's activities related to election legislation in 2021.
<p>Beverly Evans Smith, Chair of the Board, National President, Delta Sigma Theta</p> <p>Shavon Arline-Bradle, Co-Chair Social Action Commission, Delta Sigma Theta</p> <p>Rhonda Briggins, Co Chair Social Action Commission Delta Sigma Theta</p> <p>Mythe Kirven, Texas Social Action Coordinator, Delta Sigma Theta</p> <p>Sharon Jones, Texas Social Action Coordinator, Delta Sigma Theta</p>	<p>c/o Kenneth Broughton Reed Smith LLP 811 Main Street, Suite 1700 Houston, TX 77002 Tel: (713) 469-3800</p>	<ul style="list-style-type: none"> • Information regarding Delta Sigma Theta's history, mission, and political participation activities. • Information regarding Delta Sigma Theta's political participation activities in Texas. • Information regarding the effects of S.B. 1 on Delta Sigma Theta's political participation resources and activities. • Information regarding the effects of S.B. 1 on members' ability to cast a ballot that will count in Texas. • Information regarding Delta Sigma Theta's activities related to election legislation in 2021.

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
<p>Jennifer Martinez, Chief Executive Officer</p> <p>Ashley Ford, Director of Public Policy & Advocacy</p> <p>Alex Cogan, Manager of Public Policy & Advocacy</p> <p>Ginger Mayeux, Contractor</p> <p>Summer Mandell, Director of Communications and Marketing</p>	<p>c/o Kenneth Broughton Reed Smith LLP</p> <p>811 Main Street, Suite 1700</p> <p>Houston, TX 77002</p> <p>Tel: (713) 469-3800</p>	<ul style="list-style-type: none"> • Information regarding The Arc Texas's history, mission, programs, and advocacy • Information regarding the effect of S.B. 1 and related legislation on The Arc Texas' resources and activities • Information regarding The Arc Texas' activities related to election legislation in 2021 • Information regarding The Arc Texas' and members' testimony to legislators regarding S.B. 1 and similar legislation • Information regarding The Arc Texas' correspondence with legislators regarding S.B. 1 and similar legislation. • Information regarding The Arc Texas' work with media regarding S.B. 1 and related legislation. • Information regarding The Arc Texas' communication with stakeholders and the general public about S.B. 1 and related legislation.
<p>Jeffrey Lamar Clemmons</p>	<p>c/o Kenneth Broughton Reed Smith LLP</p> <p>811 Main Street, Suite 1700</p> <p>Houston, TX 77002</p> <p>Tel: (713) 469-3800</p>	<ul style="list-style-type: none"> • Information regarding Mr. Clemmons' political participation activities. • Information regarding Mr. Clemmons' advocacy related to certain proposed changes to election laws in Texas. • Information regarding Mr. Clemmons' work as an election judge in Texas. • Information regarding the potential impacts of S.B. 1 on Mr. Clemmons. • Information regarding the potential impacts of S.B. 1 on Mr. Clemmons' ability to serve as an election judge in future elections.
<p>All persons identified Governor Greg Abbott's disclosures and responses to interrogatories (as amended and supplemented)</p>	<p>See Gov. Abbott's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)</p>	<ul style="list-style-type: none"> • See Gov. Abbott's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
All Persons identified in Jose Esparza's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	See Jose Esparza's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	<ul style="list-style-type: none"> See Jose Esparza's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)
All Persons identified in Warren Kenneth Paxton, Jr.'s Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	See Warren Kenneth Paxton, Jr.'s Rule 26 disclosures and Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	<ul style="list-style-type: none"> See Warren Kenneth Paxton, Jr.'s Rule 26 disclosures and Rule 26 disclosures and responses to interrogatories (as amended and supplemented)
All Persons identified in Jacque Callanen's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	See Jacque Callanen's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	<ul style="list-style-type: none"> See Jacque Callanen's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)
All Persons identified in Isabel Longoria's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	See Isabel Longoria's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	<ul style="list-style-type: none"> See Isabel Longoria's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)
All Persons identified in the Rule 26 disclosures and responses to interrogatories (as amended and supplemented) by any party in any of the consolidated cases, 5:21-cv-0844-XR; 1:21-cv-0780-XR; 1:21-cv-0786-XR; 5:21-cv-0920-XR	See respective party's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)	<ul style="list-style-type: none"> See respective party's Rule 26 disclosures and responses to interrogatories (as amended and supplemented)
Sen. Bryan Hughes	110 N. College Ave., Ste. 207 Tyler, Texas 75702	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Donna Campbell	229 Hunters Village, Ste. 105 New Braunfels, TX 78132	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Sen. Joan Huffman	2900 Wesleyan Street, Suite 500 Houston, TX 77027	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Jane Nelson	1225 S. Main Street, Suite 100 Grapevine, TX 76051	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Robert Nichols	329 Neches Street Jacksonville, TX 75766	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Drew Springer	100 Austin Ave. Suite 103 Weatherford, TX 76086	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Paul Bettencourt	11451 Katy Freeway, Suite 209 Houston, TX 77079	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Charles Creighton	350 Pine Street, Suite 1450 Beaumont, Texas 77701	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Angela Paxton	604 S. Watters Road, Suite 100 Allen, TX 75013	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Larry Taylor	6117 Broadway, Suite 122 Pearland, TX 77581	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Brian Birdwell	900 Austin Avenue, Suite 500 Waco, TX 76701	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Bob Hall	Alliance Building #2 6537 Horizon Road, Suite B-1 Rockwall, Texas 75032	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Sen. Charles Perry	11003 Quaker Avenue, #101 Lubbock, TX 79424	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Dawn Buckingham	4400 Buffalo Gap Road Suite 0400 Abilene, Texas 79606	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Lois Kolkhorst	2000 S. Market St. #101 Brenham, TX 77833	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Charles Schwertner	3000 Briarcrest Drive Suite 202 Bryan, TX 77802	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Briscoe Cain	606 Rollingbrook Drive Suite 1E Baytown, TX 77521	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Mike Schofield	1550 Foxlake Drive, Suite 120, Houston, TX 77084	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Jacey Jetton	1108 Soldiers Field Dr., Suite 100 Sugar Land, TX 77479	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Tom Oliverson	12345 Jones Rd #221 Houston, Texas 77070	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Stephen Allison	1635 NE Loop 410 Suite 506 San Antonio, Texas 78209	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Charles Anderson	900 Austin Ave., Suite 804 Waco, TX 76701	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Rep. Ernest Bailes	10501 Hwy 150 Suite B Shepherd, TX 77371 Mailing: PO Box 1116 Shepherd, TX 77371	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Trent Ashby	2915 Atkinson Dr. Lufkin, TX 75901	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Cecil Bell	18230 FM 1488, Ste. 302 Magnolia, TX 77354	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Kyle Biedermann	616 W. Main St., Suite 101, 101A, 102 Fredericksburg, TX 78624	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Greg Bonnen	174 Calder Rd. Ste. 116 League City, TX 77573	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Brad Buckley	1301 North Stagecoach Road Salado, Texas 76571	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Dewayne Burns	115 S. Main Street, Suite 202 Cleburne, TX 76033	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Dustin Burrows	10507 Quaker Avenue, Suite 103 Lubbock, Texas 79424	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Angie Button	1201 International Parkway #130 Richardson, TX 75081	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Giovanni Capriglione	1100 Bear Creek Parkway Keller, Texas 76248 Mailing: PO Box 770 Keller, Texas 76244	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Rep. Jeff Cason	1600 Airport Fwy Suite 370 Bedford, TX 76022	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. David Cook	309 E. Broad Street, Mansfield, TX 76063	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Drew Darby	36 W. Beauregard Suite 517 San Angelo, TX 76903	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. John Cyrier	1017 Main Street Bastrop, Texas 78602	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Jay Dean	101 E. Methvin, Suite 103 Longview, Texas 75601	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Jake Ellzey	122 N. Beaton St. Corsicana, TX 75110	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. James Frank	1206 Hatton Road Wichita Falls, TX 76302	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. John Frullo	5717 66th Street, Suite 116-117 Lubbock, Texas 79424	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Craig Goldman	4521 South Hulen Street, Suite 208 Fort Worth, TX 76109	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Sam Harless	6630 Cypresswood Dr., Suite 150 Spring, Texas 77379	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Cody Harris	214 E. Elm St. Hillsboro, TX 76645 Mailing Address P.O. Box 278 Hillsboro, TX 76645	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Rep. Cole Hefner	115 W. 1st Street Mount Pleasant, TX 75455	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Dan Huberty	4501 Magnolia Cove Dr. #201 Kingwood, TX 77345	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Justin Holland	101 E. Rusk St., # 201 Rockwall, Texas 75087	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Lacey Hull	10190 Katy Freeway, Suite 555G Houston, TX 77043	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Kyle Kacal	3000 Briarcrest Dr., Suite 203, Bryan, TX 77802	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Phil King	Nan and Bob Kingsley Building 1710 Martin Drive Weatherford, TX 76086 mailing address PO Box 1418 Weatherford, TX 76086	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Matt Kruse	1949 Golden Heights Road, Suite 106 Fort Worth, Texas 76177	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. John Kuempel	200 N. River Street, #100-E Seguin, Texas 78155	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Stan Lambert	547 Chestnut Abilene, Texas 79602	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Brooks Landgraf	P.O. Box 2910 Austin, TX 78768	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Rep. Jeff Leach	550 S. Watters Road Suite 280 Allen, TX 75013	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Ben Leman	401 South Austin Street Brenham, Texas 77833	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. J.M. Lozano	1512 Wildcat Dr. Suite 100 Portland, Texas 78374	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Travis Clardy	202 East Pilar, Room 310 Nacogdoches, Texas 75961	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. William Metcalf	1835 Spirit of Texas Way, Suite 100 Conroe, TX 77301	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Morgan Meyer	3131 McKinney Avenue #649 Dallas, TX 75204	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Mayes Middleton	2101 Mechanic Street Suite 245 Galveston, TX 77550	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Geanie Morrison	1908 N. Laurent, Suite 500 Victoria, Texas 77901	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Jim Murphy	9525 Katy Freeway Suite 215 Houston, Texas 77024	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Andrew Murr	507 Earl Garrett Street Kerrville, Texas 78028	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Candy Noble	206 North Murphy Road Murphy, Texas 75094	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Rep. Chris Paddie	102 West Houston St. Marshall, Texas 75670	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Tan Parker	800 Parker Square, Suite 245 Flower Mound, TX 75028	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Jared Patterson	5533 FM 423, Suite 503 Frisco, Texas 75034	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Dennis Paul	17225 El Camino Real Blvd Suite 415 Houston, TX 77058	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Four Price	Amarillo National Bank Plaza Two, Suite 506 500 S. Taylor Street Amarillo, Texas 79101 Mailing: P.O. Box 2848 Amarillo, Texas 79105	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. John Raney	4103 South Texas Avenue, Suite 103 Bryan, Texas 77802	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Glenn Rogers	600 E Depot Street Brownwood, TX 76801	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Scott Sanford	115 West Virginia Street, Suite #103 McKinney, TX 75069	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Matt Schaefer	200 E. Ferguson, Ste. 506 Tyler, TX 75702	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Matthew Shaheen	6501 Legacy Drive, #LL1 Plano, TX 75024	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Rep. Hugh Shine	4 South 1st Temple, TX 76501	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Bryan Slaton	6537 Horizon Rd. Suite B Heath TX 75032	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Shelby Slawson	910 Old Hico Rd Stephenville, TX 76401	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Reggie Smith	421 N. Crockett St. Sherman, TX 75090	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. John Smithee	320 S. Polk, 1st Floor Amarillo, TX 79101	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. David Stephenson	834 Third Street Rosenberg, TX 77471	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Lynn Stucky	400 West Oak Street, suites 106 Denton, Texas 76201	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Valoree Swanson	23008 Northcrest Dr Spring, TX 77389	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Ed Thompson	2341 N. Galveston Ave., Suite 120 Pearland, Texas 77581	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Tony Tinderholt	4381 W. Green Oaks Blvd. Ste. 107 Arlington, Tx 76016	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Steve Toth	25700 Interstate Hwy 45, Ste. 100 Spring, TX 77386	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Rep. Gary VanDeaver	Bowie County Courthouse 710 James Bowie Drive New Boston, Texas 75570	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Cody Vasut	222 N Velasco Street, Suite 25 Angleton, TX 77515	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. James White	P.O. Box 395, Woodville, TX 75979 205 N. Charlton Street Woodville, Texas 75979	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Terry Wilson	710 Main Street Suite 242 Georgetown, Texas 78626	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Beverly Powell	1612 Summit Avenue, Suite 101 Fort Worth, TX 76102	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Terry Canales	602 W. University Dr. Suite B Edinburg, Texas 78539	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Nicole Collier	101 S. Jennings Suite 103A Fort Worth, Texas, 76104	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Sen. Eddie Lucio Jr.	221 E. Van Buren Avenue, Ste. 1 Harlingen, Texas 78550	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. Garnet Coleman	5445 Almeda, Suite 501 Houston, TX 77004	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. John Turner	10300 N. Central Expressway, Suite 198 Dallas, Texas 75231	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Name	Address and Telephone Number (if known)	Subject of Discoverable Information (based upon Plaintiffs' best information at the time of filing)
Rep. Keith Bell	100 E. Corsicana Street, Suite 204 Athens, Texas 75751	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation
Rep. David Spiller	P.O. Box 447 Jacksboro, TX 76458	<ul style="list-style-type: none"> Information regarding the intent, purpose, design, drafting, revision, and passage of SB1 or related legislation

Additional witnesses who may have discoverable information that Plaintiffs may rely upon to support their claims include: (1) all expert witnesses designated by any party in any of the consolidated cases; (2) all individuals designated by any party in any of the consolidated cases as a Rule 30(b)(6) witness; (3) all individuals or entities served by any party in any of the consolidated cases with a subpoena during the course of this suit; (4) all individuals or entities noticed and/or deposed in any of the consolidated cases; and (5) all individuals or entities referred to in any document produced by any party or third-party in any of the consolidated cases.

Plaintiffs will timely amend or supplement this list of persons having knowledge of facts relevant to its claims and defenses as its investigation into the facts relevant to this case continues. Plaintiffs reserve the right to seek discovery from, and relating to, other persons that may subsequently become known as persons likely to have discoverable information. Plaintiffs further reserve the right to modify the below list and to identify and call as witnesses additional persons if, during the course of their investigation and discovery relating to this case, Plaintiffs learn that such additional persons have knowledge or information that Plaintiffs may use to support their claims, defenses, and proposed remedies.

- 2. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

Plaintiffs are working diligently and in good faith to identify and collect relevant documents and information in their possession, custody, or control. Plaintiffs believe based on their most current information that documents and ESI they may use to support their claims will include the following.

- Plaintiffs' internal communications
- Defendants' internal communications
- Documents and communications relating to:
 - Plaintiff Houston Justice's organizational mission, resources, and political participation activities
 - Plaintiff Houston Area Urban League's organizational mission, resources, and political participation activities
 - Plaintiff Delta Sigma Theta's organizational mission, resources, and political participation activities
 - Plaintiff The Arc Texas' organizational mission, resources, and political participation activities
 - Plaintiff Jeffrey Clemmons's prior service as an election judge
- Documents and communications produced by Defendants in this case

Plaintiffs specifically reserve the right to amend or supplement these disclosures as they identify additional documents, ESI, and tangible things that support their claims. Plaintiffs also reserve the right to rely upon documents that are identified by other parties to this litigation in their respective Rule 26 Disclosures and/or documents produced by other parties or third parties in any of the consolidated cases.

3. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or

other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of the injuries suffered.

Plaintiffs are not currently seeking monetary damages from the Defendants. To the extent costs, expenses, and reasonable attorneys' fees are awarded, the calculation thereof is premature at this early stage of litigation.

- 4. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Plaintiffs are not aware of any insurance agreement relevant to this action.

Respectfully submitted November 5, 2021

REED SMITH LLP, NAACP LEGAL DEFENSE &
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/s/ Kenneth E. Broughton

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** Admitted Pro Hac Vice*

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CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2021, a copy of the foregoing was served on Defendants via electronic mail.

/s/ Kenneth E. Broughton

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